## **EXHIBIT 68-18**



Dimitrov vs Stavatti Aerospace **Brian Colvin** 

## IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

Valentino Dimitrov, individually and on behalf of all others similarly situated, ) Plaintiffs, ) Case No.: vs. )2:23-CV- 00226-PHX-DJH Stavatti Aerospace, Ltd, a Minnesota corporation; Stavatti Aerospace, Ltd, a Wyoming corporation; Stavatti Corporation, a Minnesota DEPOSITION OF corporation; Stavatti BRIAN COLVIN Immobiliare, Ltd, a Wyoming corporation; Stavatti Industries, Ltd, a Wyoming March 6, 2025 Corporation; Stavatti Niagara, ) 9:07 a.m. Ltd, a New York corporation; Stavatti Super Fulcrum, Ltd, a Wyoming corporation; Stavatti Ukraine, a Ukrainian business entity; Stavatti Heavy Industries, Ltd, a Hawaii Corporation; Christopher Beskar and Maja Beskar, husband and wife; Brian Colvin and Corrina Colvin, husband and wife; John Simon and Jean Simon, husband and wife; William Mcewen and Patricia Mcewen, husband and wife; Rudy Chacon and Jane Doe Chacon, husband and wife; and DOES 1 through 10, inclusive, Defendants.

REPORTED BY:
JOVANNA ROMAN, RPR
Certified Reporter
Certificate No. 50725

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- 1 | the discussion surrounding the loan with the board of
- 2 directors?
- 3 A. Yes.
- Q. And, to your knowledge, was there anyone else in
- 5 | the company that was assisting in soliciting funds?
- A. That was insisting on soliciting funds?
- 7 Q. That was assisting.
- 8 A. Oh, assisting.
- 9 Q. That was also bringing in individuals to lend
- 10 money.
- 11 A. Carl Hunking.
- 12 Q. Can you spell that last name.
- 13 A. I can try. H-U-N-K-I-N-G I think.
- Q. Do you recall what Carl's position was with the
- 15 | company?
- 16 A. No.
- 17 Q. Was he on the board of directors?
- 18 A. No.
- 19 Q. Was he an employee of Stavatti?
- 20 A. I don't know. I don't recall.
- 21 Q. Were you ever paid a finder's fee for bringing in
- 22 | a loan to the company?
- 23 A. Ten percent was earmarked for that, yes.
- 24 | Q. Ten percent would go directly to you?
- 25 A. Yes, but I put it towards the Stavatti UAVS to



- further the development of the company, to help make the company fruitful.
  - Q. Are you a registered broker-dealer with the SEC?
- A. No. I was not personally. I didn't do anything wrong. I wasn't personally profiting from this. It was for the development of the UAVS program.
- Q. Did Mr. Beskar ever have discussions with the individuals you presented prior to their execution of the promissory note?
- A. No. He didn't want the conversation. He just wanted to get the projects going and get the money allocated to get the projects going because the war had -- basically things has elevated in Ukraine and we needed to get the MIG project going.
- Q. So it wasn't standard practice for you to introduce Mr. Beskar to any potential lender?
- A. No. I was never required, never asked, no.

  Mr. Beskar asked me on a trip back from Nevada when we were trying to re -- resolve and develop funds to pay off debt and to get launched, he asked me to get whatever we needed to do, whatever we could pull together we needed to get it going because the war was evolving. Things were evolving in Ukraine and we needed to act and get going so he cleared the -- I made up the, as I said, made the note. He -- and the deck that he approved and asked me to go get money.



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- 1 A. Yes.
- Q. Do you recall around the time that that was?
- 3 A. I do not.
- 4 Q. Do you recall the amount that you deposited?
- 5 A. 900,000 -- 900,000 was deposited I recall.
- Q. And Mr. Dimitrov's loan was for a total of
- 7 | \$1 million; correct?
  - A. Correct. 900,000 went to Stavatti Aerospace and 100,000 went to the drone division to buy drone equipment.
- Q. Was that a part of the 10 percent fee that you were allocated if you brought in lenders?
- 12 A. Yes.

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- MR. ABATE: Form.
- THE WITNESS: Actually as my employment
  agreement as we agreed when I raise capital, ten percent
  did not come to me. It went to funding the drone division
  and furthering the development of the -- of the drone
  technology and drone division to be able to get contracts.
- 19 BY MS. SILVA:
- Q. Did you have access or signatory authority to any Stavatti bank account?
- A. No. Mr. Beskar gave me the account and I went and deposited it there.
- Q. I'm going to share my screen and we're going to enter Exhibit C. Can you read this okay, Mr. Colvin?



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87 1 EXAMINATION 2 BY MS. SILVA: I just have one follow-up real quick. 3 4 Α. Okay. 5 Q. Mr. Colvin, in your time at Stavatti, did you ever 6 see the company manufacture an aircraft? 7 Α. No. 8 MS. SILVA: Okay. Thank you. Nothing 9 further. 10 MR. DUNMIRE: I do have one follow-up 11 question on that point. 12 13 EXAMINATION BY MR. DUNMIRE: 14 15 Q. So, Brian, do you -- from your knowledge of the intellectual property owned by Stavatti, that with the 16 appropriate funding they would be -- have the ability to 17 create airplanes and build airplanes? 18 19 Α. Absolutely, yes. 2.0 Q. And that's -- that was the whole reason for being 21 at this company; correct? 22 Α. Correct. All intellectual property of the planes that it 23 24 had designs for and then intellectual property rights to 25 and so forth?

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1	STATE OF ARIZONA ) ) ss.	
2	COUNTY OF MARICOPA )	
3	BE IT KNOWN that the foregoing proceedings were	
4	taken before me; that the witness before testifying was duly sworn by me to testify to the whole truth; that the	
5	foregoing pages are a full, true, and accurate record of the proceedings, all done to the best of my skill and ability; that the proceedings were taken down by me in	
6	shorthand and thereafter reduced to print under my direction.	
7		
8	I CERTIFY that I am in no way related to any of the parties hereto, nor am I in any way interested in the outcome hereof.	
9	odecome nercor.	
10	[ ] Review and signature was requested; any changes made by the witness will be attached to the	
11	original transcript.  [X] Review and signature was waived/not	
12	requested. [ ] Review and signature not required.	
13		
14	I CERTIFY that I have complied with the ethical obligations set forth in ACJA $7-206(F)(3)$ and ACJA $7-206$ $J(1)(g)(1)$ and $(2)$ .	
15	Dated at Phoenix, Arizona, this 2nd day of April, 2025.	
16		
17	/s/Jovanna Roman	
18	JOVANNA ROMAN, RPR  Certified Reporter	
19	Arizona CR No. 50725	
20	* * * * *	
21	I CERTIFY that GRIFFIN GROUP INTERNATIONAL, has	
22	complied with the ethical obligations set forth in ACJA $7-206$ (J)(1)(g)(1) through (6).	
23	/g/Domolo A Criffin	
24	/s/Pamela A. Griffin GRIFFIN GROUP INTERNATIONAL	
25	Registered Reporting Firm Arizona RRF No. R1005	

